

# Sheets & Crossfield, PLLC

ATTORNEYS AT LAW

309 East Main Street • Round Rock, TX 78664-5246

Phone 512-738-8732 (D) • fax 512-255-8986

mylan@scrrlaw.com

September 7, 2021

## RULE 11 CONDEMNATION SETTLEMENT AGREEMENT

Via e-mail [jkspivey@svtxlaw.com](mailto:jkspivey@svtxlaw.com)

Jim Spivey  
Spivey & Valenciano, PLLC  
McAllister Plaza  
9601 McAllister FWY, Ste 130  
San Antonio, TX 78216

Re: Williamson County—Southeast Loop  
Cause No. 21-0921-CC2; *Wilco v. Fuessel Holdings, LLC*  
Parcel No.: 94

Dear Jim:

Please allow this letter to constitute a Rule 11 Settlement Agreement between Williamson County, Texas (“County”) and Fuessel Holdings, LLC (“your client” or “Condemnee”) in connection with the project identified herein and the fee simple right of way parcel interest to be acquired as part of the County’s Southeast Loop road improvement project. The terms of this Agreement and the settlement reached are as follows:

1. County agrees to pay, and your client agrees to accept, the total sum of One Million Three Hundred-Forty Thousand and No/100 Dollars (**\$1,340,000**) in compensation to the Condemnee in the above referenced lawsuit for the acquisition of 17.268 acres sought to be acquired, and any damages to the remaining property of your clients not acquired, with such location and acquisition as further described in County’s current pleadings on file in this case.

The parties agree that an Agreed Special Commissioners Award in this amount shall be entered by the appointed commissioners at the hearing currently scheduled for September 9, 2021.

2. It is agreed that neither County nor your client will file objections to the Award of Special Commissioners in this cause so long as the Williamson



County Commissioners Court approves the \$1,340,000 settlement amount on September 14, 2021.


3. Subject to Williamson County Commissioner Court approval of this agreement, County agrees to deposit \$1,340,000 within the court's registry by September 23, 2021.

If this letter correctly sets forth the terms of our Rule 11 agreement and the settlement reached between the County and your client, please so indicate by having the appropriate person execute this letter in the space indicated below on behalf of the property owners.

Very truly yours,

Mylan W. Shaunfield  
Sheets & Crossfield, PLLC  
Attorneys for County

**AGREED AND ACCEPTED:**

  
\_\_\_\_\_  
Jim Spivey  
Spivey & Valenciano, PLLC  
Attorney for Fuessel Holdings, LLC

Date: 9-7-2021

**AGREED AND ACCEPTED:**

WILLIAMSON COUNTY, TEXAS

By: \_\_\_\_\_  
Bill Gravell, Jr.  
County Judge

Date: \_\_\_\_\_